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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF FILING OF REVISED
PROPOSED ORDER AND AMENDED
DECLARATION IN SUPPORT OF
GROOM LAW RETENTION
APPLICATION**

Re: Dkt. No. 1527
Date: May 9, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: May 2, 2019
4:00 p.m. (Pacific Time)

1 **PLEASE TAKE NOTICE** that on April 17, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (the “**Debtors**”) in the above-captioned
3 chapter 11 cases, filed the *Application Pursuant to 11 U.S.C. § 327(e) and Fed. R. Bankr. P. 2014(a)*
4 *and 2016 for Authority to Retain and Employ Groom Law Group, Chartered as Special Employee*
5 *Benefits Counsel for the Debtors Effective as of the Petition Date* [Dkt. No. 1527] (the
6 “**Application**”).

7 **PLEASE TAKE FURTHER NOTICE** that a proposed form of order with respect to the
8 relief sought therein was attached as Exhibit A to the Application (the “**Original Proposed Order**”).

9 **PLEASE TAKE FURTHER NOTICE** that, contemporaneously with the Application, the
10 Debtors submitted the Declaration of David N. Levine in support of the Application [Dkt. No. 1528]
11 (the “**Original Levine Declaration**”).

12 **PLEASE TAKE FURTHER NOTICE** that the hearing on the Motion is scheduled to be
13 held on **May 9, 2019, at 9:30 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) at the United States
14 Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy**
15 **Court**”) in the courtroom of the Honorable Dennis Montali, United States Bankruptcy Judge,
16 Courtroom 17, 16th Floor, 450 Golden Gate Avenue, San Francisco, California 94102. Oppositions
17 or responses, if any, to the relief requested in the Application are required to be filed and served on
18 or before May 2, 2019 at 4:00 p.m. (Pacific Time) (the “**Objection Deadline**”).

19 **PLEASE TAKE FURTHER NOTICE** that, attached hereto as **Exhibit 1-1** and **Exhibit 1-**
20 **2**, respectively, are copies of the Debtors’ revised proposed order on the Application (the “**Revised**
21 **Proposed Order**”) and a redline comparison of the Revised Proposed Order against the Original
22 Proposed Order.

23 **PLEASE TAKE FURTHER NOTICE** that, contemporaneously herewith, the Debtors filed
24 an Amended Declaration of David N. Levine in support of the Application [Dkt. No. •] (the
25 “**Amended Levine Declaration**”). A redline comparison of the Amended Levine Declaration
26 against the Original Levine Declaration is attached hereto as **Exhibit 2**. The revisions reflected in
27 the Revised Proposed Order and the Amended Levine Declaration reflect comments received from
28 the Office of the United States Trustee (the “**U.S. Trustee**”) to the Application and corrections to
billing rates to conform to the Master Services Agreement between the Debtors and Groom Law
Group, Chartered.

PLEASE TAKE FURTHER NOTICE that the Debtors reserve the right to further amend,
modify, or supplement the proposed order on the Application at any time up to and during the
Omnibus Hearing.

PLEASE TAKE FURTHER NOTICE that copies of the pleadings and other documents
identified herein can be viewed and/or obtained: (i) by accessing the Court’s website at
<http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
Clerk LLC (“**Prime Clerk**”), at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-
4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

1 Dated: May 1, 2019

2 **WEIL, GOTSHAL & MANGES LLP**
3 **KELLER & BENVENUTTI LLP**

4 /s/ Jane Kim

5 Jane Kim

6 *Attorneys for Debtors and Debtors in Possession*